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**To:** [E-OHPSCA-ER.EBSA](#)  
**Subject:** 90-Day waiting period  
**Date:** Wednesday, September 26, 2012 11:01:54 AM

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To whom it may concern:

We would like a little clarification on how this requirement is going to be implemented. Most of our clients already have a 90 day (or 3 month waiting period) before new hires are eligible for Group Benefits. More times than not the waiting period is "First of the Month" (FOM) following 90 days of hire. Meaning that the employee's effective date under the Group Benefits would be the first day of the month following the completion of 90 days of FT work (example: Hire Date was January 3, 2012, benefits would be effective May 1, 2012). So the actual "waiting period" is 90 days, but the "benefits" would not be "effective" until the First of the Month after the 90 days. The law indicates a "90 day waiting period", it does refer to the "effective date" of coverage.

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